



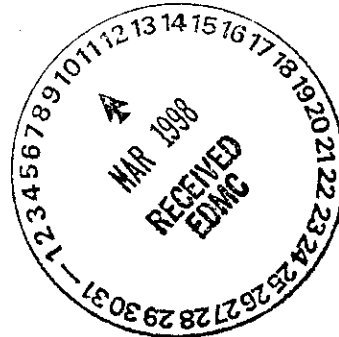
Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0046676

98-EAP-136

MAR 04 1998

Mr. R. E. Skinnarland  
State of Washington  
Department of Ecology  
200 Area Section  
1315 West Fourth Avenue  
Kennewick, Washington 99336



Dear Mr. Skinnarland:

**CERTIFIED ISO WEST INTERIM ORGANIC STORAGE TANK (ISO WEST TANK)  
ADMINISTRATIVE CLOSURE TECHNICAL DATA SYNOPSIS (TSD:TS-2-3)**

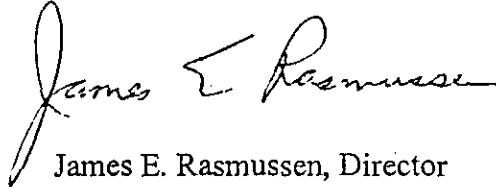
The certified B Plant Complex ISO West Tank Administrative Closure Technical Data Synopsis (synopsis) is attached. Submittal of this synopsis to the State of Washington Department of Ecology (Ecology) is in accordance with the discussions held at the B Plant Project Managers Meeting (PMM) on January 29, 1998.

The synopsis documents and provides certification that the ISO West Tank never contained dangerous waste. Acceptance of the synopsis by Ecology will allow the ISO West tank to be removed from regulation under the Washington Administrative Code Chapter 173-303, "Dangerous Waste" and allow the ISO West tank to be reused for other purposes.

MAR 04 1998

Should you have any questions, please contact Ellen M. Mattlin, U.S. Department of Energy, Richland Operations Office, on (509) 376-2385 or Fred A. Ruck, III, Fluor Daniel Hanford, Inc., on (509) 376-9876.

Sincerely,

A handwritten signature in cursive script that reads "James E. Rasmussen".

James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division

EAP:EMM

Attachment

cc w/attach:

Administrative Record  
Ecology Library, Lacey  
S. D. Godfrey, BWHC  
R. E. Heineman, BWHC  
J. R. Wilkinson, CTUIR  
D. R. Sherwood, EPA  
W. D. Adair, FDH  
G. W. Reddick, FDH  
F. A. Ruck III, FDH  
D. Powaukee, NPT  
J. Adler, WMH  
R. Jim, YIN

46-08

ISO West Interim Organic Storage Tank  
Administrative Closure Technical Data Synopsis

1.0 INTRODUCTION

1.1 Purpose

The purpose of this synopsis is to support the request for administrative closure by the U.S. Department of Energy, Richland Operations Office (RL), and Fluor Daniel Hanford, Inc. (FDH), of the Washington State Hazardous Waste Management Act (Chapter 70.105 Revised Code of Washington) Permitted ISO West Interim Organic Storage Tank (ISO West). The ISO West is one of two external storage tanks in the organic mixed waste storage system in the B Plant Complex's 276-BA Interim Organic Storage Facility (276-BA Facility). Information discussed below will demonstrate that the ISO West tank never stored dangerous waste or mixed waste. The administrative closure of the tank will modify the Hanford Facility Permit Application by eliminating the ISO West tank from the B Plant Complex Part A, Form 3.

1.2 Previous Application Submittal

Revision 4 of the B Plant Complex Part A Permit Application, Form 3 was submitted to the State of Washington, Department of Ecology, by RL in May 1996. This revision added storage of organic mixed waste in two external tanks to the Part A, Form 3.

2.0 FACILITY DESCRIPTION

The ISO West tank is located within the 276-BA Facility. The 276-BA Facility is located north-east of the 221-B Building (B Plant) within the B Plant Complex. The 276-BA Facility consists of a concrete secondary containment structure holding the ISO West and ISO East Interim Organic Storage Tanks (ISO East). The ISO West tank is a stainless steel tank originally designed as a 17,500 liter shipping container. The overall dimensions of the ISO West tank are 6.1 meters long by 3.0 meters high by 2.5 meters wide.

3.0 PROCESS INFORMATION

3.1 Operations History

The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) established Milestone M-82-03 "Complete Removal of Organic Solvent Waste from the B Plant Canyon." To meet this milestone, the 276-BA Facility was constructed and both the ISO West and ISO East tanks were installed during 1996. During March 1997, the organic mixed waste was transferred from the B Plant canyon tanks to the ISO East tank. The ISO West tank was left empty to be used as an emergency receiver tank if the need arose. The organic mixed waste was removed from the ISO East tank and shipped off-site for disposal during November 1997. During this time, the ISO West tank remained empty and never stored waste.

ISO West Interim Organic Storage Tank  
Administrative Closure Technical Data Synopsis

3.2 Data Gathering

A records review was used to confirm that regulated waste storage did not occur in the ISO West tank. The approach used and the results of this data gathering effort is described in the following sections.

3.2.1 Approach

Several sources of information were used or examined to provide assurance to FDH and RL that the certification statement provided is true, accurate, and complete. These information sources included:

- DOE/RL-88-21, *Hanford Facility Dangerous Waste Part A Permit Application*, B Plant Complex, Part A Permit Application, Form 3, Revision 4
- SD-WM-RRR-013 *B Plant Organic Removal Readiness Checklist*
- Letter, James E. Rasmussen, DOE-RL, to Jerry Leitch, EPA, "Notice of Construction (NOC) to Operate the B Plant Organic Solvent Transfer and Storage System," 96-EAP-324, dated September 4, 1996
- B Plant Plant Operating Procedure (POP) WP-B-97-005, Revision A, Modification 0, *Transfer Organic to ISO Tank*
- B-Plant Organic Storage Tank Off-Loading Critical Lift Procedure, Impact Level S, Revision 1
- B Plant POP BO-040-002, Revision G, Modification 0, *Perform General Surveillance*
- B Plant POP WP-B-097-015, Revision A, Modification 0, *Transfer Organic from Storage Tank to Tanker*

3.2.2 Data Gathering and Records Review

The results of the data gathering supported the contention that no regulated activity took place in the ISO West tank. The results of the data gathering activity are summarized in the following sections.

The review of various documents (*B Plant Organic Removal Readiness Checklist*, NOC letter for air permitting, POP *Transfer Organic to ISO Tank*) clearly indicated the intention was to use both the ISO East and ISO West tanks for storage of the organic mixed waste. For example, the POP *Transfer Organic to ISO Tank* contains the complete procedure for transferring organic mixed waste into both of the tanks.

ISO West Interim Organic Storage Tank  
Administrative Closure Technical Data Synopsis

The plan for transferring the organic mixed waste was as follows:

1. Stage the empty tanks on a flat-bed trailer adjacent to the B Plant canyon building (221-B Building).
2. Transfer the organic mixed waste from the canyon tank(s) into the ISO tank(s) via a temporary transfer system.
3. After the transfer into the ISO tank(s), move the full tank(s) to the 276-BA Facility.
4. Lift the ISO tank(s) from the trailers into the 276-BA Facility and secure them in place.

A review of the completed POP, *Transfer Organic to ISO Tank*, showed that only one of the tanks (ISO East) was used for storing organic mixed waste and the other tank (ISO West) was not used. The completed POP, *Transfer Organic to ISO Tank*, clearly identifies and documents that only 10,933 liters (2,888.1 gallons) of organic mixed waste was transferred into the ISO East tank (capacity 17,500 liters). The same procedure also documents that only the ISO East tank was moved from the transfer location (adjacent to B Plant) to the 276-BA Storage Facility. The completed POP includes signatures and initials from the operators and supervisory personnel involved. These sign-offs were done to document completion of hold-points and of specific activities. This provides a written, verifiable record of the activities performed.

The completed Critical Lift Procedure also documents that one tank (ISO East) containing waste was moved from the transport truck into the 276-BA Facility secondary containment structure. The procedure includes signatures and initials from the operators and supervisory personnel involved. These sign-offs were done to document completion of specific activities. This provides a written, verifiable record of the activities performed.

Additional documentation is provided in the completed POP, *Perform General Surveillance*. In this POP, only the ISO East tank was being checked for leakage or material in the secondary containment. None of the data sheets show evidence of any leaks. These data sheets are signed and provide a written, verifiable record that there were no leaks. The ISO West tank, since it did not contain waste, was not and did not need to be included in the procedure. The completed POP, *Transfer Organic from Storage Tank to Tanker*, continues in documenting that only one tank (ISO East) was involved when the organic mixed waste was transferred to a tanker trailer for shipment to off-site disposal.

#### 4.0 SUMMARY

The documents examined include verifiable, signed, and initialed documentation that the ISO West tank was never used for the storage of dangerous waste. Also, the documents clearly identify that dangerous waste was placed into and managed only in the ISO East tank. Therefore, RL and Project Hanford Management Contract personnel request that the ISO West tank at B Plant's 276-BA Facility be administratively closed.

ISO West Interim Organic Storage Tank  
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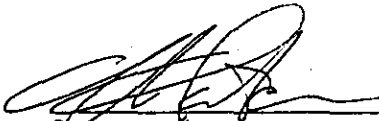
5.0 ISO WEST INTERIM ORGANIC STORAGE TANK ADMINISTRATIVE CLOSURE TECHNICAL  
DATA SYNOPSIS CERTIFICATION

"I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Owner/Operator  
John D. Wagoner, Manager  
U.S. Department of Energy  
Richland Operations Office

3/4/98  
Date



Co-operator  
H. J. Hatch  
President and  
Chief Executive Officer  
Flour Daniel Hanford, Inc.

Apr 2, 1998  
Date